

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Eastern District of Texas

United States of America

v.

Hubert Wright

Defendant(s)

FILED

AUG - 2 2016

Clerk, U.S. District Court
Texas Eastern

Case No.

6:16MJ

117

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 19, 2016 in the county of Smith in the
Eastern District of Texas, the defendant(s) violated:*Code Section*21 U.S.C. § 841(a)(1)
18 U.S.C. § 924(c)*Offense Description*

On or about May 19, 2016, in the Eastern District of Texas, Hubert Wright did possess with intent to distribute crack and powder cocaine and possessed a firearm during the commission a drug trafficking crime, in violation of 21 U.S.C. § 841(a)(1) and 18 U.S.C. § 924(c).

This criminal complaint is based on these facts:

See attached affidavit of Special Agent Craig Redden

☒ Continued on the attached sheet.

Complainant's signature

Special Agent Craig Redden, ATF

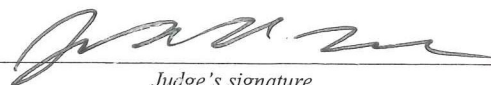
Printed name and title

Sworn to before me and signed in my presence.

Date:

8-2-16

City and state:

Tyler, Texas

Judge's signature

John D. Love, United States Magistrate Judge

Printed name and title

Affidavit of ATF Special Agent Craig Redden
in Support of Criminal Complaint of Hubert WRIGHT

Craig Redden being duly sworn, deposes and states the following:

1. I make this affidavit from personal knowledge based on my participation in this investigation, including witness interviews by myself and/or other law enforcement agents, communications with others who have personal knowledge of the events and circumstances described herein, and information gained through my training and experience. The information outlined below is for limited purpose of establishing probable cause and does not contain all details or all facts of which I am aware related to this investigation.

2. I am employed as a Special Agent of the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF) and I am assigned to the Tyler, Texas Field Office of the Dallas Field Division which is located in the Eastern District of Texas. I have been employed by the ATF for approximately 2 ½ years. I have received training through the Criminal Investigators Training Program and the ATF Special Agent Basic Training program at the Federal law Enforcement Training Center in Glynco, Georgia. Prior to my employment with ATF, I was employed as a detective in the Dallas Police Department Gang Unit and assigned as a task force officer to the Immigration, Customs Enforcement (ICE) Homeland Security Investigations (HSI) National Gang Unit where I was involved in multiple investigations regarding weapons violations, narcotics violations, and violent crime.

3. I am currently conducting an investigation into the distribution of crack cocaine along with the possession of firearms during a drug trafficking crime by Hubert WRIGHT (B/M 3-24-1957; FBI # 184346P9) which are violations of 18 U.S.C. § 924(c) and 21 U.S.C. § 841(a)(1).

4. On May 19, 2016, Special Agents of the Alcohol, Tobacco, Firearms and Explosives (BATFE) along with Detectives of the Tyler Police Department and members of the Texas Department of Public Safety SWAT team executed a Federal Search Warrant (6:16MJ72) at the residence of Hubert WRIGHT and Carla WRIGHT located at 508 West 4th Street, Tyler Texas to search for evidence related to the distribution of powder and crack cocaine and the possessing of firearms during a drug trafficking crime.

5. During the search of the residence Special Agents recovered approximately 2,404 grams of powder cocaine, approximately 201 grams of crack cocaine, \$335,195.00 in United States cash currency, 6 firearms, along with scales, and packaging utilized for the distribution of crack and powder cocaine. Special Agents recovered firearms in the bedroom where both Hubert and Carla WRIGHT slept as well in the studio room where the cash, crack cocaine, powder cocaine, and packaging was stored. Special Agents also discovered multiple metal cage doors mounted on doorframes throughout the residence.

6. During a post-Miranda interview of Hubert WRIGHT conducted on May 19, 2016, WRIGHT admitted to the distribution of powder and crack cocaine along with possessing the firearms recovered in his residence. WRIGHT further admitted to installing metal cage doors through his residence due to an attempted home invasion robbery which occurred several years earlier due to WRIGHT's drug sales. Wright also admitted to purchasing several of the firearms, including a .50 caliber Desert Eagle semiautomatic handgun (Recovered in the studio where cocaine and cash was recovered) along with the MAK 90 Semiautomatic rifle, which was recovered from the bedroom, from individuals off of the street. WRIGHT admitted to purchasing these firearms, along with others, for protection, during his cocaine distribution activities.

7. Based on the aforementioned facts, affiant believes there is probable cause to believe that on or about May 19, 2016, Hubert WRIGHT committed the violations of 21 U.S.C. § 841(a)(1) and 18 U.S.C. § 924(c), when he possessed, with intent to distribute, crack and powder cocaine, and possessed firearms during the commission of a drug trafficking crime.


8. Furthermore, based on the foregoing, I believe there is probable cause to believe that WRIGHT's residence located at 508 W. 4th Street, Tyler, Texas constitutes facilitating property and is subject to forfeiture pursuant to Title 21, USC, Section 853 and 28 U.S.C. 2461.

9. Therefore, affiant respectfully requests an arrest warrant for Hubert WRIGHT.



Special Agent Craig Redden
Bureau of Alcohol, Tobacco Firearms & Explosives

Sworn and subscribed before me on this 2nd day of August, 2016



John D. Love
United States Magistrate Judge
Eastern District of Texas